

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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J.D WORKFORCE, INC.,

Case No.: 1:22-cv-7930

Plaintiff,

ORDER TO SHOW CAUSE

-against-

MOHAMED J. GAFOOR and ABC COMPANY,

Defendants.

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Upon the annexed Complaint, the declarations of Emanuel Kataev, Esq. and Hamwattie Bissoon, and the annexed Memorandum of Law in support,

LET the defendants, Mohamed J. Gafoor and ABC Company (collectively the “Defendants”), show cause before _____

_____, of this Court to be held at the courthouse thereof, located at 225 Cadman Plaza East, Brooklyn , NY 11201, on the ____ day of _____, 2023 at _____ o’clock in the _____ noon of that day, or as soon thereafter as counsel can be heard, why an order should not be issued:

(a) preliminarily enjoining Defendants and any persons or entities acting in concert with or on behalf of defendant, from using in any manner whatsoever J.D Workforce, Inc.’s trade secret and confidential and proprietary information (including, without limitation, J.D Workforce, Inc.’s customer database, including the identity and contact information of J.D Workforce, Inc.’s customers, or any other information regarding J.D Workforce, Inc.’s customers, clients, transactions, financial information, pricing information, or other matters involving J.D Workforce, Inc.;

(b) directing Defendants to return to J.D Workforce, Inc. all originals and copies of

documents, records, and information, whether in hard copy and/or computerized and/or other electronic media form, that contain J.D Workforce, Inc.'s trade secrets and confidential and proprietary information (including, without limitation, J.D Workforce, Inc.'s customer database, including the identity and contact information of J.D Workforce, Inc.'s customers, and for each customer of J.D Workforce, Inc., the services offered and payments received from J.D Workforce, Inc.'s customers, and/or other matters involving J.D Workforce, Inc. and which Defendants obtained or accessed, including without limitation information regarding J.D Workforce, Inc.'s customers, clients, transactions, financial information, pricing information, or other information involving J.D Workforce, Inc.;

(c) directing Defendants to make all electronic accounts that are in their custody or control and on which they stored information regarding J.D Workforce, Inc.'s trade secrets and confidential or proprietary information available and accessible to J.D Workforce, Inc. (including providing relevant passwords) to inspect to ensure J.D Workforce, Inc.'s trade secrets and confidential and proprietary information is secure and has not been improperly copied or distributed;

(d) preliminarily enjoining Defendants from continuing to operate their business until such time that J.D Workforce Inc. recovers its confidential and proprietary information from Defendants;

(e) preliminarily enjoining Defendants from contacting any of J.D Workforce, Inc.'s clients and/or individuals currently performing services for J.D Workforce, Inc.;

(f) preliminarily enjoining Defendants from contacting any of J.D Workforce, Inc.'s current or former employees to solicit them to leave the employment of J.D Workforce, Inc.; and

(g) preliminarily enjoining Defendants from operating their business, and it is further

ORDERED, that pending the hearing and determination of this application, and further order of this Court, Defendants and any persons/entities acting in concert with them, are hereby:

(a) preliminarily enjoined from using in any manner whatsoever J.D Workforce, Inc.'s trade secret and confidential and proprietary information (including, without limitation, J.D Workforce, Inc.'s customer database, including the identity and contact information of J.D Workforce, Inc.'s customers, or any other information regarding J.D Workforce, Inc.'s customers, clients, transactions, financial information, pricing information, or other matters involving J.D Workforce, Inc.);

(b) directed to return to J.D Workforce, Inc. all originals and copies of documents, records, and information, whether in hard copy and/or computerized and/or other electronic media form, that contain J.D Workforce, Inc.'s trade secrets and confidential and proprietary information (including, without limitation, J.D Workforce, Inc.'s customer database, including the identity and contact information of J.D Workforce, Inc.'s customers, and for each customer of J.D Workforce, Inc., the services offered and payments received from J.D Workforce, Inc.'s customers, and/or other matters involving J.D Workforce, Inc. and which Defendants obtained or accessed, including without limitation information regarding J.D Workforce, Inc.'s customers, clients, transactions, financial information, pricing information, or other information involving J.D Workforce, Inc.;

(c) directed to make all electronic accounts that are in their custody or control and on which they stored information regarding J.D Workforce, Inc.'s trade secrets and confidential or proprietary information available and accessible to J.D Workforce, Inc. (including providing relevant passwords) to inspect to ensure J.D Workforce, Inc.'s trade secrets and confidential and proprietary information is secure and has not been improperly copied or distributed;

(d) preliminarily enjoined from continuing to operate their business until such time that J.D Workforce Inc. recovers its confidential and proprietary information from Defendants; and

(e) preliminarily enjoined from contacting any of J.D Workforce, Inc.'s employees, clients, and/or vendors,

(f) preliminarily enjoined from operating their business and it is further

(g) preliminarily enjoining Defendants from contacting any of J.D Workforce, Inc.'s current or former employees to solicit them to leave the employment of J.D Workforce, Inc.; and

(h) preliminarily enjoined from destroying any electronic or other communications or documents related to its business and J.D Workforce, Inc.

ORDERED that pending the hearing of this matter, J.D Workforce Inc. shall be permitted to conduct discovery on an expedited basis, including obtaining documents from Defendants and taking depositions in aid of the requested injunctive relief, and it is further

ORDERED that service by email and federal express of a copy of this Order, along with the papers upon which it is based, shall be made upon Defendants at 20119 104th Avenue, Saint Albans, NY 11412 their last known address, and jamalgafoor517@gmail.com & jamal11081990@gmail.com, on or before the ____ day of January, 2023, and such service shall be deemed good and sufficient; and it is further

ORDERED that answering papers, if any, shall be served on J.D Workforce, Inc.'s counsel, Emanuel Kataev, Esq., Milman Labuda Law Group PLLC, 3000 Marcus Avenue, Suite 3W8, Lake Success, NY 11042-1073, via electronic mail at emanuel@mllaborlaw.com on or before the ____ day of _____, 2022.

Dated:

SO ORDERED:

, U.S.D.J.